

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TRUSTEES OF THE CHICAGO PAINTERS AND	)	
DECORATORS PENSION FUND; TRUSTEES OF THE	)	
CHICAGO PAINTERS AND DECORATORS	)	
WELFARE FUND; TRUSTEES OF THE CHICAGO	)	
PAINTERS AND DECORATORS SAVINGS FUND;	)	
TRUSTEES OF THE CHICAGO PAINTERS AND	)	
DECORATORS APPRENTICESHIP FUND; TRUSTEES	)	No. 14 C 4382
OF THE CHICAGO PAINTERS AND DECORATORS	)	
SCHOLARSHIP FUND; AND TRUSTEES OF THE	)	
CHICAGO PAINTERS AND DECORATORS JOINT	)	Judge Durkin
COOPERATION TRUST FUND,	)	
Plaintiffs,	)	
v.	)	
	)	
	)	
CR2 PAINTING, LTD. d/b/a COLOUR REVUE	)	
PAINTING & SANDBLASTING, INC., an Illinois	)	
Corporation,	)	
Defendant.	)	

**PLAINTIFFS' MOTION FOR JUDGMENT IN A SUM CERTAIN**

Plaintiffs, by and through their attorneys, DONALD D. SCHWARTZ, JAMES R. ANDERSON, GRANT R. PIECHOCINSKI, and ARNOLD AND KADJAN, move this Court to enter an order of default against the individual defendant, and Judgment in a Sum Certain on Count II of the Complaint against both defendants. In support of their Motion, the Plaintiffs state as follows:

1. This is an action to recover delinquent fringe benefit fund contributions.
2. The corporate defendant was served and defaulted by order of this Court on July 29 2014.
3. The individual defendant was served with the Summons and Complaint on January

15, 2015, as shown on the return of service that was filed with the Clerk of the Court on February 2, 2015.

4. More than twenty-one days have passed after service of process and the individual defendant has not served an Answer or any other responsive pleading.

5. The Defendants has not moved for an enlargement of time in which to answer or otherwise plead.

6. According to the Affidavit of Sarah Radtke, attached as Exhibit 1, the defendants owe the amount of \$17,326.64, as the balance due on the installment note pled in the complaint.

7. Federal Rule of Civil Procedure 54(b) allows for the entry of judgment on discrete claims of the Complaint.

WHEREFORE, Plaintiffs pray for the following relief:

A. That this Court enter judgment in favor of Plaintiffs and against the Defendants, CR2 and Kurt Williams, jointly and severally in the amount of \$17,326.64, and expressly find that there is no just reason for delay in the entry of a final judgment on Count II of the complaint. (proposed order attached as Exhibit 2).

Respectfully submitted,

TRUSTEES OF THE CHICAGO PAINTERS et al,

s/ James R. Anderson

One of their attorneys

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